

**COMPREHENSIVE
SAFETY
COMPLIANCE, INC.**

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February 19, 2007

Mr. Richard A. Lanzillo, Attorney
Knox McLaughlin Gornall & Sennett, PC
120 West 10th Street
Erie, PA 16501

RE: FCI-McKean – UNICOR Facility

Dear Mr. Lanzillo:

Based upon review of the relevant documents and information provided to me pertaining to the subject case, my opinion regarding the noted issues is as follows:

1. The respiratory protection at the UNICOR facility included no provision for protection against airborne organic vapors emissions (acetone, toluene, n-hexane, hexane isomers) associated with Lockweld 860/861 adhesive.

The exhaust air recycle system was not equipped with a vapor adsorption unit (typically activated carbon) to eliminate organic vapor build-up in recycled breathing air.

OSHA reported that the exhaust efficiency of the Lockweld Spray Application Booth was impaired by the presence of materials within the booth.

2. The composition of a bulk dust sample obtained by OSHA in the Micore board processing area was reported to be 30% SVF (Synthetic Vitreous Fiber) and 20% silica. Finely divided particles of this general composition are known to be potent eye, skin, and respiratory irritants and should not be classified as "nuisance" dust. Dust masks utilized for respiratory protection were not fit-tested in accordance with OSHA respirator protocol.

If the dust does indeed contain 20% crystalline silica, the OSHA permissible exposure limit (PEL) would be defined according to the formula:

$$\text{PEL} = \frac{10 \text{ mg/m}^3}{\% \text{SiO}_2 + 2} = \frac{10 \text{ mg/m}^3}{(20+2)} = 0.46 \text{ mg/m}^3$$

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3. The OSHA and Microbac airborne particulate surveys were directed toward Micore board dust only. No measurements were conducted to evaluate airborne organic vapor concentrations associated with Lockweld 860/861 solvent-based adhesive. The reported details did not indicate whether the airborne contaminant measurements were associated with normal production levels.
4. I have been informed by you and your associates that the UNICORE facility is no longer in operation and that the processing equipment has been transferred to other locations. Thus I am unable to render an opinion regarding precise concentrations of airborne contaminants of concern during normal operating conditions.

Sincerely,

CSC, Inc.

David R. Williams
David R. Williams, CIH
Certified Industrial Hygienist